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September 26, 2022

VIA NYED Pro Se Electronic Document Submission

★ SEP 28 2022 ★

Honorable Joan M. Azrack
United States District Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

LONG ISLAND OFFICE

Re: *Ajay Bahl v. New York College of Osteopathic Medicine of New York Institute of Technology, et al.*, 14-CV-04020 (JMA)(LGD)

Dear Judge Azrack:

I am the Plaintiff in the above referenced action. I write, without objection from defendants, to request a forty-five-day extension of the deadline to oppose NYIT's motion for summary judgment. This is my third request for an extension of time in reference to the motion.

The above would effectively amend the summary judgment briefing schedule as follows:

- Plaintiff's deadline to oppose NYIT's motion for summary judgment is extended from September 30th, 2022 to November 14, 2022.
- NYIT's deadline to serve its reply is extended from November 11th, 2022 to December 23, 2022.

The operative briefing schedule was decided between opposing counsel and my previous attorney who appeared to after failing to secure a quick settlement agreement, and after unilaterally granting defendants seven separate time extensions, he abandoned me as a client, on the day that defendants were to file their opening brief.

My attempt to write my own opposition brief has been emotionally overwhelming given the triggering nature of the content despite my best efforts to mitigate. My strength/weakness profile is particularly ill suited for the pro se demands of writing the opposition brief given the sheer volume and breath of the record to date.

I have been in discussion with a number of other attorneys for possible representation but have been unable to finalize an agreement as of yet. I expect to come to an agreement within the coming days and I request this time so that the attorneys have the six weeks to write the opposition.

/s/ Ajay Bahl
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